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obtained from the State Department at Washington, passports as a citizen of the United States, and armed therewith he departed for China, and returning subsequently was refused permission to land. On *habeas corpus* it was held, that the naturalization of Gee Hop by the court of New Jersey was absolutely null and void, and that passports reciting the fact of his citizenship were not conclusive proof of the facts therein contained.

Constitutional Law—Jury Trial—Unanimity of Verdict.—*Pratt v. Parsons*, 43 Pac. Rep. 620 (Utah). The legislature of a State may pass a law to the effect that in civil actions a verdict may be rendered by a concurrence of nine or more jurors, and such law will not be in conflict with the clause of the constitution which provides that in suits at common law, where the value in controversy shall exceed \$20, the right of trial by jury shall be preserved.

Executor—Purchase from Legatee—State ex rel Jones v. Jones et al., 33 S. W. Rep. 23 (Mo.). An executor may purchase from a legatee his interest in the estate, but the burden of proving absence of fraud rests upon him, because of the trust relation.

Garnishment of City Funds—Execution.—*Murphree v. City of Mobile et al.*, 18 Sou. Rep. 740 (Ala.). A plot of land owned by a city and not shown to have been used for municipal purposes may be sold under execution against the city. Money derived from the sale of such land is subject to garnishment when deposited in a bank which by statute is only a depository for such funds as are collected for taxes, licenses, fines, penalties and forfeitures.

Municipal Corporations—Injury to Firemen—Assumed Risk.—*Farley v. Mayor, etc., of City of New York*, 36 New York Supplement, 1115. The plaintiff, a hose-cart driver in the fire department, was injured by the collision of the hose-cart with a truck which had been left standing in a dark street. It was held that as he was driving at a speed of more than five miles an hour contrary to a city ordinance, and in entering the service he had assumed the extra risk, he could not recover from the city; especially as he had accepted the pension provided by the city for firemen injured in the course of their employment.

Municipal Corporations—Rights in Streets—Grants to Railroad Companies—Freight Houses—Right of Way.—*City of St. Paul v. Chicago, M. & St. P. Ry. Co.*, 65 N. W. Rep. 649 (Minn.) The